

CHARLES B. PERKINS #126942
FLYNN, ROSE & PERKINS
59 North Santa Cruz Avenue, Suite Q
Los Gatos, California 95030
(408) 399-4566 – Office
(408) 399-6683 - Fax
Email: cbperk@earthlink.net

ARTHUR JOHNSON #36415
BUTTS & JOHNSON
481 North First Street
San Jose, California 95112
(408) 293-4818 – Office
(408) 293-4857 - Fax

Attorneys for Plaintiff
PAUL STAPLES

DENNIS G. ROLSTAD #150006
SEDDWICK, DETERT, MORAN & ARNOLD, LLP
One Market Plaza, 8th Floor
San Francisco, California 94105-1420
(415) 627-3435 – Office
(415) 781-2635 – Fax
Email: dennis.rolstad@sdma.com

Attorney for Defendant
HARTFORD LIFE AND ACCIDENT INS. CO.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

PAUL STAPLES,

Plaintiff,

VS.

HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY; and DOES 1 through 25, inclusive,

Defendants.

Case No. C07 03285 JF

STIPULATION AND PROPOSED ORDER
CONTINUING MOTION DATE

WHEREAS, at the initial Case Management Conference in this matter on October 5, 2007, a Motion hearing date was set for March 7, 2008, and the parties were ordered to complete private Mediation by December 31, 2007;

1 WHEREAS, despite diligent attempts to schedule and complete the Mediation by
2 December 31, 2007, the parties were not able to do so;

3 WHEREAS, the Mediation is scheduled for January 30th, 2008;

4 THEREFORE, the parties, by their attorneys of record, hereby stipulate and request that the
5 Motion hearing date of March 7, 2008 be continued to April 11, 2008, or thereafter.

6 IT IS SO STIPULATED:

7
8 DATE: 1/3/08

FLYNN, ROSE & PERKINS
BUTTS & JOHNSON

9
10 By Charles B. Perkins
11 CHARLES B. PERKINS
Attorney for Plaintiff

12 DATE: _____

SEDGWICK, DETERT, MORAN &
ARNOLD, LLP

13
14 By _____
15 DENNIS ROLSTAD
Attorney for Defendant

16
17 **ORDER**

18 Having considered the Stipulation of the parties, it is hereby ordered that the Motion
19 hearing date in this matter, currently scheduled for March 7, 2008, is hereby continued to

20 _____.

21 IT IS SO ORDERED.

22
23 Dated: _____

24 JEREMY FOGEL, Judge, U.S. District
Court.

1 WHEREAS, despite diligent attempts to schedule and complete the Mediation by
2 December 31, 2007, the parties were not able to do so;

3 WHEREAS, the Mediation is scheduled for January 30th, 2008;

4 THEREFORE, the parties, by their attorneys of record, hereby stipulate and request that the
5 Motion hearing date of March 7, 2008 be continued to April 11, 2008, or thereafter.

6 IT IS SO STIPULATED:

7 DATE: 1/3/08

8 FLYNN, ROSE & PERKINS
BUTTS & JOHNSON

9 By Charles B. Perkins
10 CHARLES B. PERKINS
11 Attorney for Plaintiff

12 DATE: 1/7/08

13 SEDGWICK, DETERT, MORAN &
14 ARNOLD, LLP

15 By Dennis Rolstad
16 DENNIS ROLSTAD
17 Attorney for Defendant

18 **ORDER**

19 Having considered the Stipulation of the parties, it is hereby ordered that the Motion
20 hearing date in this matter, currently scheduled for March 7, 2008, is hereby continued to

21 IT IS SO ORDERED.

22 Dated: _____

23 JEREMY FOGEL, Judge, U.S. District
24 Court.